

ENVIRONMENTAL REVIEW COMMITTEE REPORT

ERC MEETING DATE: August 22, 2011

Project Name: McCormick Plat

Owner/Applicant: Robert E. McCormick, 161 Mapleway Road, Selah, WA 98942

Contact: Greg Diener, P.E., Pacific Engineering Design LLC, 15445 53rd Avenue S, Suite 100, Seattle, WA 98188

File Number: LUA11-034, ECF, PP, V-A, PPUD

Project Manager: Vanessa Dolbee, Senior Planner

Project Summary: The applicant is requesting Environmental Review (SEPA), a Preliminary Plat and Planned Urban Development (PUD), and a Critical Areas Variance to place utilities in a stream buffer, for a 34-lot subdivision of one parcel located at 16405 Maple Valley Highway. The subject site is zoned Residential 8 (R-8) units/net acre and is approximately 7.32 acres in area. A portion of the site is located within King County, in the RA-5 zone, resulting in a total land area of 11.59 acres. The proposed density of the site would be 6.33 dwelling units per net acre. The site is currently developed with the Valley View Mobile Home Park, which contains 40 mobile homes and two stick-built structures. The proposed lots range in size from 2,444 square feet to 3,421 square feet. In addition to the 34 lots, 10 tracts are proposed for Critical Areas, Open Space, Utilities, Stormwater, and a Park. Access to all lots is proposed via new roads off of the Maple Valley Highway. The subject site contains landslide hazards, seismic hazards, erosion hazards, wetlands, and a stream; as such, the applicant provided a Critical Areas Report and a Geotechnical Report. Excluding trees located in critical areas, the applicant has proposed to retain two significant trees on site and replant with a minimum of 36 new trees. The development would require approximately 8,248 cubic yards of excavated material and 7,924 cubic yards of fill. The proposed project would provide two new public streets and a public alley in addition to a small park and circular trail system and a detention pond.

Project Location: 16405 SE Renton-Maple Valley Road

Exist. Bldg. Area SF:	2,232 square feet	Proposed New Bldg. Area (footprint):	N/A
		Proposed New Bldg. Area (gross):	N/A

Site Area:	11.59 acres	Total Building Area GSF:	N/A
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STAFF RECOMMENDATION: Staff Recommends that the Environmental Review Committee issue a Determination of Non-Significance - Mitigated (DNS-M).



Project Location Map

PART ONE: PROJECT DESCRIPTION / BACKGROUND

The applicant, Robert McCormick, is requesting Environmental Review (SEPA), a Preliminary Plat and Planned Urban Development (PUD), and a Critical Areas Variance to place utilities in a stream buffer, for a 34-lot, 8 tract subdivision of an 11.59 acre site. The proposed McCormick Plat would be located along the south side of Maple Valley Highway (SR-169) at 16405 SE Renton-Maple Valley Road (parcel #2323059029). The site consists of one parcel, the majority of which is located within the City of Renton. However, a long, narrow "dog leg" extends southward off the southeastern side of the rectangular portion of the site; this portion is within unincorporated King County, which is not proposed to be developed. The site is currently the location of the Valley View Mobile Home Park, which provides space for approximately 40 mobile homes. In addition to the mobile homes and multiple out buildings on site, there are two permanent structures, a duplex and maintenance building. The applicant proposes to remove all existing structures, and mobile homes. The site is bordered to the north by Maple Valley Highway (SR-169), to the west the Summer View neighborhood, a single-family residential subdivision, and the south and east by undeveloped forested areas.

The subject property is zoned Residential 8 dwelling units per net acre (R-8) and the portion located in King County is zoned Rural Area, 1 dwelling unit per acre (RA-5) King County zoning. The proposed development would be within the R-8 zone as such, R-8 development standards would be applicable to the subject project. The portion of the site zoned RA-5 remains within King County. The Land Use designation is Residential Single Family (RSF) for the portion located within the City of Renton, and is Rural Residential, 1 du/2.5-10ac for the King County portion. The proposed subdivision would result in 34 lots ranging in lot size from 2,444 square feet to 3,421 square feet, resulting in a net density of 6.33 dwelling units per acre. In addition to the single family lots, 8 tracts are proposed which included stormwater detention, Native Growth Protection Areas, access and utilities, Open Space, and critical areas. In addition to the traditional subdivision lots and tracts, the applicant has proposed a looped trail around the site which crosses Open Space tract E and C and a small tot lot with a play area.

The subdivision would gain access from Maple Valley Highway at one access point, identified as "Road A", herein. Road A connects to a looped road, "Road B", which provides access throughout the development. Proposed Lots 1 – 8, and 11 – 17 are directly accessed off of Road B. Proposed Lots 9 and 10 would gain access via an access and utilities Tract, identified as Tract D. Proposed Lots 18 - 34 would be accessed via a proposed alley, "Road C". In addition, a 20-foot wide right-of-way dedication is proposed along the frontage of SR-169. Road improvements including sidewalks on both sides on Road A, and on one side of Road B are proposed. Street frontage improvements are not proposed along SR 169.

Pursuant to the City of Renton's critical areas maps, wetlands, a stream, steep slopes, erosion hazards, landslide hazards and seismic hazards have been identified on the subject property. The geotechnical hazards located on the site are due to the steep slope inclinations, soils generally susceptible to erosion, and history of landslides in the area. The critical areas map indicates that the approximate northerly portion of the rectangular area of the site is within a Seismic Hazard area. In addition, the northeast corner of the site is located within the 200-foot Shoreline Area measured from the Cedar River, which is located across Maple Valley Highway. The shoreline area impacts proposed Lots 9 and 10, Lot 10 would be approximately 170 feet from the ordinary high water mark (OHWM) and Lot 9 would be approximately 190 feet from the OHWM. The "dog leg" portion of the site, located in King County, would be subject to King County critical areas regulations, KCC 21A.24, whereas the remainder of the site would be subject to City of Renton critical areas regulations. King County Sensitive Areas Maps indicated that the subject site is

located in a Critical Aquifer Recharge Area and is an area susceptible to ground water contamination. The City's critical areas maps do not identify this area for Aquifer Protection.

The developed portion of the Mobile Home Park has an approximate slope of 9 to 10 percent sloping in and southeast-to-northwest direction. As this portion of the site remains within the Landslide and Erosion Hazard area, it is the mildest slope on site. The property is bounded to the south and southeast by steep slopes that extend down from the Renton uplands. The steep slope at the southeast corner of the site, ranges from about an elevation of 230 feet down to the toe-of-slope to an elevation of 160 to 180 feet, and averages about a 100 percent grade. Similarly, the steep slope adjacent to the south side of the mobile home park that extends above the creek is well over 100 feet high and has an average grade of about 100 percent. The applicant has proposed a Debris Flow Mitigation Berm along the base of the steep slope located on the southern border of the site to divert water and/or soil within the stream buffer toward the western side of the site. In addition, a 25-foot buffer from the southeastern slope is proposed for landslide protection for lots 14 – 17. The applicant has indicated that grading the site would be necessary to modify for stormwater requirements. The applicant has indicated the total excavation would be 8,248 cubic yards and fill is estimated at 7,924 cubic yards. The soil that is usable from the excavation on site would be utilized on site, other materials such as selected borrow and gravel are expected to be imported to the site.

The applicant submitted with the application a Revised Critical Areas Report, prepared by Sewall Wetland Consulting, Inc. dated April 12, 2011. This report indicates there are two wetlands located on site, both identified as Category 2 wetlands. Wetland 'A' is located along the west side of the site and Wetland 'B' is located along the northeast edge of the site. Category 2 wetlands typically have 50-foot buffers. The Critical Areas report further indentifies a single intermittent stream that flows through the site. The subject stream is a Class 3 stream and was designated as a Type N stream by Bill Kershke, King County Biologist, in his review of the feature. Class 3 streams typically have 75-foot buffers measured from the ordinary high water mark. The applicant has proposed to reduce the stream buffer from 75 feet to 60 feet for the majority of the buffer area. In addition, the applicant has requested a variance to place a water line through the stream buffer to connect to existing 10-inch water line stub provided by the neighboring Summer View neighborhood.

The area of the site that is currently developed as a mobile home park consists of ornamental plants placed by residents of the mobile home park in addition to a few large conifer trees which are scattered about the site. The steep slopes on site are covered with dense understory vegetation consisting of mostly sword ferns and an upperstory of scattered big leaf maple trees. The wetland and stream areas of the site consist mainly of reed canary grass, creeping buttercup and a few small alders.

It should be noted, that the applicant currently has a vested King County project for a 34-lot subdivision at this site. A number of the environmental studies submitted with this application are the same studies submitted with the older King County project. As such, many of these studies contain a cover memo and/or letter addressing any changes based on the changes to the project.

PART TWO: ENVIRONMENTAL REVIEW

In compliance with RCW 43.21C.240, the following environmental (SEPA) review addresses only those project impacts that are not adequately addressed under existing development standards and environmental regulations.

A. Environmental Threshold Recommendation

Based on analysis of probable impacts from the proposal, staff recommends that the Responsible Officials:

Issue a DNS-M with a 14-day Appeal Period.

B. Mitigation Measures

1. The debris flow mitigation berm shall be constructed as a part of the plat infrastructure installation. The berm shall be inspected and a letter of approval shall be submitted to the City from Otak verifying compliance with the standards specified within their May 17, 2010 Geomorphic and Debris Flow Analysis. The construction and certification letter shall be received by the Planning Division prior to final plat recording.
2. A final Debris Flow Mitigation Area Maintenance Plan including engineering details shall be submitted and approved by City of Renton Project Manager prior to Final Plat approval; this plan shall be made available to the new residence of the McCormick Plat and shall be included as part of the neighborhood Code, Covenants, and Restrictions (CC&R).
3. The applicant shall comply with the recommendations found in the geotechnical report prepared by Geotech Consultants, Inc., dated April 1, 2008, the response letter dated September 9, 2008, and the recommendations included in the Geomorphic and Debris Flow Analysis, prepared by Otak, dated May 17, 2010. Including but not limited to:
 - a. The installation of a Debris Flow Mitigation Berm.
 - b. A 25-foot buffer should be established from the southeastern slope.
 - c. If soil is deposited into the buffer via landslides and/or soil movement, the soil should be removed within a few weeks to keep the buffers free to "catch" more soil in the future.
 - d. All foundations shall be supported on at least 2 feet of structural fill, non individual footings should be used, and foundations should be designed to span 10-foot unsupported.
4. The vehicle storage area/parking area located on the southern portion of the site shall be decommissioned and the area shall be re-vegetated to the minimum amount necessary to prevent erosion; this re-vegetation shall be included in the final mitigation and monitoring plan for stream buffer reduction. The final mitigation and monitoring plan shall be submitted to the Planning Department Project Manager for review and approval prior to final plat recording.
5. The applicant shall comply with the recommendations found in the *Revised* Critical Areas Report & Supplemental Stream Study, prepared by Sewall Wetland Consulting, Inc., dated August 12, 2011.
6. Construction fencing and silt fencing shall be placed along the buffer (or reduced buffer) of the stream and wetlands during construction. During construction of the debris flow mitigation berm, the fencing may be moved south to provide space to construct the berm within the buffer area.
7. Additional downstream analysis shall be conducted to analyze the impacts of stormwater runoff on Ron Regis Park and any impacts to the Park shall be mitigated. This analysis can be included in the Drainage Report submitted with the construction permit application.

8. If any Native American grave(s) or archaeological/cultural resources (Indian artifacts) are found, all construction activity shall stop and the owner/developer shall immediately notify the City of Renton Planning Division, concerned Tribes' cultural committees, and the Washington State Department of Archeological and Historic Preservation.
9. The applicant shall comply with the recommendations found in the Traffic Impact Analysis prepared by TraffEx, dated October 14, 2010, that was submitted with the project application and provided a right turn pocket along SR-169 for safe access to the subject site.
10. The applicant shall pay the Traffic Impact/Mitigation Fee as required at the time of Final Plat recording, Construction Permit, or Building Permit based on the codes in place at that time.
11. The owner of the Valley View Mobile Home Park ("owner") voluntarily agrees and shall pay the relocation cost of the homeowners within the Valley View Mobile Home Park subject to the following conditions:
 - a. The relocation assistance program currently administered by the Department of Commerce pursuant to RCW 59.21 and WAC 365-212 ("State Relocation Assistance Program") must exist at the time notice of closure of the Park is provided by the Owner;
 - b. Assistance shall be provided to all homeowners that reside within Valley View Mobile Home Park at the time of park closure notice and meet the State Relocation Assistance Program income requirements for eligibility, however those homeowners whom qualify for relocation assistance under the State Relocation Assistance Program and the Department of Commerce must verify the homeowners qualification;
 - c. The Owner will pay up to \$7,500 for a single-section home and \$12,000 for a multi-section home, the funds would be paid only those relocation cost for which the State Relocation Assistance Program provides reimbursement, including but not limited to removal and reattachment of attached awnings, decks, and stairs; prep for transport; moving the home; permits; hook-ups to all utilities; rental of moving equipment; repair of damage caused during transport; or demolition and a down payment for another manufactured home; and
 - d. The Homeowner must agree in writing using a form acceptable to the Owner that the right to reimbursement provided by the State Relocation Assistance program is assigned to the Owner.
12. Information shall be posted on site visible to the residents notifying them of any land use actions and or permits submitted that would affect the subject property. The notice shall be posted prior to submittal to the City or the same day as the submittal.

C. Exhibits

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| Exhibit 1 | Cover Sheet – Neighborhood Map |
| Exhibit 2 | Preliminary Plat Map |
| Exhibit 3 | TESC and Tree Removal Plan |
| Exhibit 4 | Conceptual Site Plan |
| Exhibit 5 | Site Stream buffer Sections |
| Exhibit 6 | Conceptual Road and Site Section |
| Exhibit 7 | Conceptual Pond and Berm Section |

Exhibit 8	Slope Analysis
Exhibit 9	Existing Conditions
Exhibit 10	McCormick Plat Conceptual Mitigation Plan
Exhibit 11	Mitigation Plan Planting Sheet
Exhibit 12	Mitigation Plan Notes Sheet
Exhibit 13	Conceptual Landscape Plan
Exhibit 14	Conceptual Landscape Plan Notes and Details
Exhibit 15	Property Services Comments
Exhibit 16	Muckleshoot Indian Tribe Comments and City's Response

D. Environmental Impacts

The Proposal was circulated and reviewed by various City Departments and Divisions to determine whether the applicant has adequately identified and addressed environmental impacts anticipated to occur in conjunction with the proposed development. Staff reviewers have identified that the proposal is likely to have the following probable impacts:

1. Earth

Impacts: With the project application, the applicant submitted a Preliminary Geotechnical Engineering Report prepared by Geotech Consultants, Inc., dated April 1, 2008, which was accompanied by a cover letter dated October 8, 2010. The subject property contains four distinct topographic features; the developed existing Mobile Home Park, the south slope, the southeast slope, and the "dog leg" ravine.

The developed area is located at the mouth of a ravine, and the overall topography is that of a relatively gentle-to-moderate slope extending to the northwest towards the Cedar River. The Geotechnical report indicates that the site elevations within the developed portions of the mobile home park range from about elevation 180 feet at the southeast corner down to about elevation 120 feet over a southeast-to-northwest diagonal distance of about 550 lineal feet, which is about a grade of 9 to 10 percent. The report further indicates that the grades within the developed portions of the site vary based on past grading completed to develop the interior road, mobile home pads and various facility building sites. According to this report, the Valley View Mobile Home Park has been located at this site nearly 50 years. In this time, grading was done; fill was placed at the top of the slope and some excavation done at the bottom to install an ecology block wall.

The site is bounded by steep slopes on the south and southeast sides, these areas have been identified on City of Renton critical areas maps as Landslide Hazard and Erosion Hazard areas. The critical areas maps indicated that the Hazards associated with landslides and erosion cover the entire site including the developed portions of the site with the milder slopes. The steep slope at the southeast corner of the site, which represents the south flank of the ravine mouth, ranges from an approximate elevation of 230 feet to the toe-of-slope which has elevations ranging from 160 to 180 feet, with an average grade of about 100 percent. The Geotechnical report indicates that some grading had been conducted in the past along the southeastern slope because a concrete-block wall is located at the base. Similarly, the steep slope adjacent to the south side of the mobile home park extends above the creek and is well over 100 feet high and has an average grade of about 100 percent.

Pursuant to the provided geotechnical report, the "dog leg" portion of the site extends about another 925 feet southwards and upslope of the main mobile home park site. The extension follows an existing

creek and a portion of this area has been graded to a uniform surface. The "dog leg" slopes gently-to-moderately down to the developed portion of the site with elevations ranging from about 310 feet at the southernmost property line down to an elevation of 180 feet where the "dog leg" meets the existing mobile home park.

The Geologic Map of King County indicated that the site and area above the site is underlain by five basic soils: 1) glacial till, 2) advanced outwash sand and gravel, 3) mostly silt, but some sand soils, deposited thousands of years before the last glacial advance into the Puget Sound, 4) mass wastage deposits that eroded or sloughed from the steep slopes and ravine areas above the site, and, 5) soils deposited as alluvium from the Cedar River. Pursuant to the Geotech Consultants, the mass wastage material was derived from erosion and landslides occurring in the ravine.

Fourteen test pits were excavated by Geotech Consultants to determine subsurface site conditions. Groundwater seepage was observed in all but four test pits, ranging in depth from 2.5 feet below surface to 11.5 feet below surface. The geotechnical report concluded that groundwater could be encountered in most areas during most of the year.

Landslide Hazards

The provided Geotechnical report indicated that many landslides were observed within the narrow ravine area above the site. The major area that this occurred is the interface of the outwash sand and gravel and underlying Pre-Fraser soils. This is because groundwater can easily flow through the outwash soil, but cannot continue downward because of the Pre-Fraser soils, which are much less pervious. The landsliding and erosion in the area has left numerous hard silt "benches" sitting about 10 to 20 feet above the base of the creek within 150 lineal feet of the south "dog leg" property line. Furthermore, the Geotech Consultants observed one such landslide just upslope, to the east of the existing water well, at the south end of the "dog leg" area. The Geotech Consultants indicated this landslide visually appeared to be about 50 feet wide by 100 feet long and about 5 feet deep. The consultants indicated that about half of the total volume of landslide soil and debris remain on the face of the slide as an elongated mound of loose, disturbed material. However, a recent landslide along the bottom of this mound suggests that future sloughing off the mound will occur. Runout of this area would likely extend to the creek bed. Shallow landslides have occurred in the past on the steep south slope. Currently, this slope is scattered with big leaf maple trees that are bowed and appeared to have moved downslope in the past. There was no observation of recent landsliding, or deep-seated landsliding, on the steep southeast and south slopes.

In 1990, a landslide event occurred in the ravine during a large rain event that caused some flooding and soil deposition in the mobile home park. During review of the, vested King County McCormick Plat (not a part of the comment period for the subject submittal) a resident of Valley View Mobile Home Park (Clyde Arnold and others) provided public comment indicating that this landslide resulted in flooding and a \$100,000 cost to the applicant, Mr. McCormick, for cleanup and removal of the debris. The provided Geotechnical report indicated that at least 200 cubic yards of soil and debris, or more, were trucked to a vacant parcel adjacent to the subject parcel. This debris was identified as a number of elongated piles of loose fill extending north south across this parcel.

The provided Geotechnical report concludes that the construction of the proposed development is suitable from a geotechnical engineering standpoint, but several significant issues have to be considered. These issues include the potential for soil movement from adjacent steep slopes, some of

which could block the existing creek, the potential for a soil moving onto the slope from the creek area in and above the southeast "dog leg" of the property, and the potential for seismic liquefaction of the upper soils in the area of the proposed development.

There are clear indications that landsliding occurs in the ravine that includes the southeastern "dog leg" of the property and the area to the south of the "dog leg". There are indications of soil movement on the steep slope that is south of the creek, on the main portion of the site. The creek that originates south of the "dog leg" could potentially become blocked by a landslide in and south of the "dog leg", and to a lesser extent from potential soil movement on the steep southern slope. The Geotech Consultants recommend (based on the 1990 event in the subject area), to protect future residences from landslide hazards, a debris flow mitigation berm would be needed at the northern edge of the stream buffer to divert water and/or soil within the buffer toward the western side of the site in the case of a landslide event. It is possible, although very unlikely, that a similar landslide could block the entire ravine soil, and that the entire soil mass could be transported by the creek to the southeastern side of the proposed development. The Geotech Consultants determined that the likelihood of this occurring is remote, although, they believe that the new development needs to be protected against the potential of this event. As such, they recommend that the easternmost 100 feet of the soil berm, that is recommended to be on the northern side of the 60-foot stream buffer, be constructed 5 feet tall and because the landslide soil would become less thick as it moved to the west; the Geotech Consultants believe that the berm can be constructed 1 foot shorter for every 50 feet west of the eastern 100-foot area to a minimum of a 2 feet tall. The 2-foot berm should be constructed along the entire northern side of the stream buffer. The 2-foot berm would be needed to divert any water from the creek that may have been rerouted during a landslide event. Furthermore, the Geotech Consultants recommend that a 25-foot buffer be established from the southeastern slope, for protection of the proposed development from landslide hazards.

Landslide Hazards – King County Review and Secondary Review

Under review of the vested King County McCormick Plat, on June 9, 2008 King County requested additional information from the applicant including but not limited to a specific geotechnical evaluation of the debris flow risk associated with an emergency overflow event or embankment breach in the pond at the head of the ravine. King County requested, if appropriate, additional mitigation measures to minimize the hazard from these and other low probability, high hazards events. Geotech Consultants, Inc., provided a response letter dated September 9, 2008, which indicated that the debris flow mitigation berm would provide protection against a debris flow that could begin well upslope of the berm. Their analysis of the proposed berm concluded that the berm would provide adequate life safety for the inhabitants of the proposed subdivision if a 1-in-100 years precipitation event, or higher, were to occur. Although, if a catastrophic event were to occur that included the failure of the upslope detention pond, the berm may be overtaken. The response letter states that the only scenario for the failure of the pond would involve a very significant earthquake during or following and extreme precipitation event and because the likelihood of two significant events occurring together is extremely low they believe that designing the berm for the possibility of the failure of the upper detention pond is not warranted for the project.

During review of the vested King County McCormick Plat, staff requested an independent secondary review by a City approved geotechnical consultant be conducted at the applicant's expense. This secondary independent evaluation of the landslide and erosion hazards provided recommendations for

mitigation that would best reduce the potential risk to human life and safety and evaluate the proposed mitigation in the report provided by Geotech Consultants, Inc, dated April 1, 2008 and the responses included in the September 9, 2008 response letter.

Kleinfelder conducted a Technical Peer Review of the provided Geotechnical report, dated April 17, 2009 and associated geotechnical drawings and letters. Kleinfelder addressed two main geotechnical issues in their peer review; landslides and the adequacy of the soil berm for life safety and liquefaction potential during an earthquake event. Kleinfelder concluded that landslides and liquefaction are the two main geotechnical hazards at the site. They concur the mitigation measures discussed for each issue appear to be reasonable and within the standard of practice. However, Kleinfelder recommended that more information should be provided on the rationale for the size and location of the debris flow mitigation berm. It was Kleinfelder's opinion that the debris flow mitigation berm, as originally designed, was not the best and most effective way to mitigate the potential hazards for future residences of the McCormick Plat. Furthermore, Kleinfelder concluded that additional analysis may be needed to estimate the debris flow volume, type of debris flow, density, kind and size of debris flow material, geometry of the blocked channel area, and velocity of the debris flow.

Geomorphic and Debris Flow Analysis

Based on Kleinfelder's recommendations, the applicant conducted a Geomorphic and Debris Flow Analysis, dated May 17, 2010 prepared by Otak. The purpose of the geomorphic investigation was to provide insight into the potential impacts on hillslope and stream channel stability if overtopping and overflow of the detention basin spillway located at the upstream extent of the ravine "dog leg" was to occur. The report included qualitative assessments regarding sediment production, flow dynamics, sediment transport capacity, and channel forming processes. Otak provided conclusions and mitigation considerations within their analysis. Otak concluded that the worst-case event would be the failure of the detention basin (pond) located at the top of the ravine (south end of the "dog leg") in combination with a 100-year rainfall event, resulting in a flow of 15.8 cfs in the ravine. Furthermore, Otak concluded that future landslide activity will occur in the ravine, that sediment introduced from colluvial processes would likely be metered out over many years, and soil deposition would occur in the area used for overflow parking near the bottom of the ravine. Otak's analysis concluded that under the worst-case scenario, 749 to 2,323 cubic yards of sediment could be delivered to the downstream reach during debris flow and active landslide conditions. Finally, Otak provided specific standards to be utilized when developing the debris flow berm to ensure the highest safety standards for the new residences of the proposed subdivision. Moreover, the berm should be 5-feet high and armored in the area at the base of the ravine, the berm should be located on the north side of the stream to insure sufficient storage for debris, and the berm can taper in height over a length of 100-feet to a minimum height of 2 feet for the remainder of the distance of the slope to Wetland A. The proposed mitigation berm is vital to the safety of the citizens that would inhabit this development, as such staff recommends as a mitigation measure that the debris flow mitigation berm be constructed and completed as a part of the infrastructure installation. The berm shall be inspected and a letter of approval shall be submitted to the City from Otak verifying compliance with the standards specified within their May 17, 2010 Geomorphic and Debris Flow Analysis. The construction and certification letter shall be received prior to final plat recording.

Debris Flow Mitigation Area Maintenance Plan

King County's letter dated June 9, 2008 also requested a conceptual "debris flow mitigation area maintenance plan" for cleaning or repairs after a debris flow event. The City of Renton received a Conceptual Debris Flow Mitigation Area Maintenance Plan on November 17, 2008, which addresses maintenance, ownership, access, and financial responsibilities. The mitigation plan was originally designed around the old plat layout and should be updated to reflect the new proposed plat plan and the debris volumes identified in the Otak report. Staff recommends as a mitigation measure, that a final Debris Flow Mitigation Area Maintenance Plan including engineering details be submitted and approved by City of Renton Project Manager prior to Final Plat approval, this plan shall be made available to the new residence of the McCormick Plat and shall be included as part of the neighborhood CC&Rs.

The saturated, alluvial soils consisting of silty sand, sand, and sandy silt have been demonstrated to have a moderate to potentially high potential for liquefaction during a large earthquake event. As such, the April 1, 2008 Geotechnical report also includes recommendations for foundations construction and footings for the proposed structures to be built on the subject site. The report also includes recommendations for excavation and grading, lowest building floors, structural fill, and foundation drains. Due to the potential hazards onsite Staff recommends as a mitigation measure that the applicant shall comply with the recommendations found in the geotechnical report prepared by Geotech Consultants, Inc., dated April 1, 2008, the response letter dated September 9, 2008, and the recommendations included in the Geomorphic and Debris Flow Analysis, prepared by Otak, dated May 17, 2010.

Due to the erosion potential of the subject site, staff recommends a mitigation measure that Temporary Erosion Control measures be installed and maintained in accordance with the latest Department of Ecology Standards with reports submitted weekly from a Certified Erosion Control Technician and a construction mitigation plan shall be submitted to the Plan Review Project Manager.

Mitigation Measures:

1. The debris flow mitigation berm shall be constructed as a part of the plat infrastructure installation. The berm shall be inspected and a letter of approval shall be submitted to the City from Otak verifying compliance with the standards specified within their May 17, 2010 Geomorphic and Debris Flow Analysis. The construction and certification letter shall be received by the Planning Division prior to final plat recording.
2. A final Debris Flow Mitigation Area Maintenance Plan including engineering details shall be submitted and approved by City of Renton Project Manager prior to Final Plat approval; this plan shall be made available to the new residence of the McCormick Plat and shall be included as part of the neighborhood Code, Covenants, and Restrictions (CC&R).
3. The applicant shall comply with the recommendations found in the geotechnical report prepared by Geotech Consultants, Inc., dated April 1, 2008, the response letter dated September 9, 2008, and the recommendations included in the Geomorphic and Debris Flow Analysis, prepared by Otak, dated May 17, 2010. Including but not limited to:
 - a. The installation of a Debris Flow Mitigation Berm.
 - b. A 25-foot buffer should be established from the southeastern slope.

- c. If soil is deposited into the buffer via landslides and/or soil movement, the soil should be removed within a few weeks to keep the buffers free to “catch” more soil in the future.
- d. All foundations shall be supported on at least 2 feet of structural fill, non individual footings should be used, and foundations should be designed to span 10-foot unsupported.

Nexus: SEPA Environmental Regulations, Critical Areas Regulations

2. Water

a. Wetland, Streams, Lakes

Impacts: The applicant submitted with the application a Critical Areas Report and a *Revised* Critical Areas Report & Supplemental Stream Study, prepared by Sewall Wetland Consulting, Inc., dated April 12, 2011 and August 12, 2011 respectively. This report and the City of Renton critical areas maps indicated that a stream flows through the site. The provided report also identified two wetlands located on the subject parcel, both identified as Category 2 wetlands.

Wetlands

The first wetland, identified as “Wetland A” herein, is located at the toe of the slope along the south side of the site and is bisected by the stream. A small portion of the wetland extends north of the stream in an old excavated low point. A foundation was identified along the north edge of the wetland in this area. Wetland A consists of a slope-type wetland where groundwater is discharging onto the surface and is 2,803 square feet in size. The second wetland, identified as “Wetland B” herein, is located along the northeast corner of the site. Wetland B consists of a salmonberry and blackberry dominated scrub-shrub slope type wetland and is 3,955 square feet. Category 2 wetlands require a 50-foot buffer. The 50-foot buffer is shown to be retained on the plat plan, and the only impacts anticipated for both Wetland A and Wetland B, is the construction of a pedestrian trail through their buffers.

Stream

The submitted Critical Areas Report also identified a single intermittent stream that extends from the uplands areas, through the south “dog leg” and downstream to the developed portion of the site. The stream varies in width but is generally less than 5 feet wide. The creek bed becomes deeply incised as the stream enters the “dog leg” portion of the site. Once the creek reaches the developed portion of the site, the creek is routed into a narrow ditch, then to an existing half-round PVC pipe that extends westward along the toe of the steep south slope. The half-round pipe stops at the westerly edge of the subject parcel and is then carried in a shallow ditch along the west property line. The creek then drains into a culvert under Maple Valley Highway and eventually discharges into the Cedar River. Sewall Wetland Consulting indicated that it does not appear to be feasible for fish to utilize this stream channel. The subject stream was reviewed during Sewall Wetland Consulting, Inc. study for the Cedar River Trail (a report dated October 15, 1996) and classified as a Class 3 stream. The stream was also designated as a Type N stream by Bill Kershke in his review, and Sewall Wetland consulting concurs with Mr. Kershke’s determination. Sewall Wetland Consultant’s review has revealed that the subject stream is intermittent and lacking any fish use. The typical buffer required for a Class 3 stream is 75 feet measured from the Ordinary High Water Mark (OHWM).

Stream Buffer Reduction

The applicant has proposed to reduce the 75-foot stream buffer to 60 feet as permitted, if compliance with RMC 4-3-050L.5.c can be met. Sewall Wetland consultants identified that the area where buffer reduction is proposed, is associated with a current site condition of asphalt mobile home pads. In addition to buffer reduction along the south side of the site where the exiting mobile homes are located, the applicant has proposed buffer reduction adjacent to the proposed storm pond. The provided stream report did not identify the need for this buffer reduction; however an e-mail received from Greg Diener on August 15, 2011 indicated that the buffer reduction was originally proposed because of a 15-foot building setback. Based on the provided e-mail, the buffer reduction is not necessary for this portion of the stream however temporary impact to the outer 15 feet of the buffer are anticipated for the construction of the detention pond. Based on the lack of need for the buffer reduction near the storm pond staff recommends denial of a buffer reduction adjacent to the proposed storm pond, but recommends approval of the temporary construction impacts with a native vegetation re-planting plan.

Page 11 of the provided Critical Areas study addressed each criterion for buffer reduction included in RMC 4-3-050L.5.c, the following table identifies the findings for the requested stream buffer reduction on the south edge of the site:

<p>RMC 4-3-050L.5.c Reduction of Buffer Width:</p>	<p>April 12, 2011 Critical Areas Report & Supplemental Stream Study Conclusions, Sewall Wetland Consulting Inc.</p>
<p>(a) (2) The buffer can be enhanced with native vegetation and removal of non-native species per criteria in subsection L5c(iv)(c) of this Section, and has less than fifteen percent (15%) slopes; and (3) The width reduction will not reduce stream or lake functions, including those of anadromous fish or nonfish habitat; and (4) The width reduction will not degrade riparian habitat; and (5) No direct or indirect, short-term or long-term, adverse impacts to regulated water bodies, as determined by the City, will result from a regulated activity. The City's determination shall be based on specific site studies by recognized experts, pursuant to subsection F3 of this section and RMC</p>	<p>(2) The slope is less than 15% and the applicant is proposing to plant native trees and shrubs in the reduced buffer area. (3) The existing functions of the buffer in the reduced area are close to none. The stream is located in a ½ culvert. Nearly all the surface next to the stream is impervious pavement, concrete slabs, mobile homes and small patches of grass. A few trees exist that can provide some woody debris to the channel, but these are of minimal value as the channel is artificial and provides no habitat in this area. The function of the buffer in the existing state have no bearing on its width since it is essentially completely developed. A reduced buffer with native plantings including trees and shrubs would provide shade, keeping water cool to benefit downstream fish habitat and would provide a source of organic debris to benefit riparian insect life and provide a habitat travel corridor. (4) As described above under subsection (3),</p>

	<p>there is no riparian habitat in this area currently. The restored 60-foot buffer will restore habitat.</p> <p>(5) No impacts to the channel would occur. All development is proposed down slope and draining away from the stream. The only work in and around the stream is the restoration of its buffer. The proposed enhancement and removal of impervious surface would improve the function of the northern buffer area substantially as outlined previously.</p>
<p>(c) The project includes a buffer enhancement plan using native vegetation and substantiates that the enhanced area will be equal to or improve the functional attributes of the buffer; or in the case of existing developed sites where a natural buffer is not possible, the proposal includes on- or off-site riparian/lakeshore or aquatic enhancement proportionate to its project specific or cumulative impact on shoreline ecological functions; and</p>	<p>The applicant has proposed a mitigation plan which includes enhancement of the buffer in the area that has been degraded in the past from use as a mobile home park. The areas where there is existing pavement and other impervious surfaces will be removed and then replanted with a mix of native trees and shrubs. The proposed reduced and enhanced buffer would provide better protection to the stream than the current condition. As previously described, the vegetation community would be enhanced within this buffer, increasing the density of woody plants, increasing shade and organic inputs to the buffer, creating habitat for wildlife and macro invertebrates, which in turn improve downstream fish habitat.</p>
<p>(d) The proposal will result in, at minimum, no net loss of stream/lake/riparian ecological function; and</p>	<p>The mitigation area consist of riparian and wetland buffer degraded from the historic use as well as a vegetation community comprised of a mix of invasive species. This area provides few of the recognized function of riparian buffers. The lack of woody vegetation reduces numerous functions in the riparian area including: lack of shading, source of woody debris recruitment, structure for riparian wildlife for food, denning and shelter, thermal cover for riparian wildlife, and a lack of durable woody plants with root systems that hold, protect and bind the stream bank in place. Comparing qualitatively and functional attributes of this area before, as well as after the enhancement with a mix of woody tree</p>

	and shrub species, reveals all functions would be increased.
(e) The proposal does not result in increased flood hazard risk; and	The proposal would not increase the flood hazard risk on the site, and in fact helps mitigate risk with the debris flow berm. In addition the removal of the impervious surface increases flood area roughness as well as provides an area for storage and infiltration of potential flood waters.
(f) The proposed buffer standard is based on consideration of the best available science as described in WAC 365-195-905.	The proposed use of enhanced buffers for reduction in width is a standard format that has been backed by many studies and is considered the "best available science". The reduced width has been compensated for through restoration and enhancement to make up for the lost function due to a reduction in width.

The applicant has provided a mitigation plan which depicts the buffer enhancement plan, and maintenance and monitoring. Conceptually the mitigation plan appears acceptable; however, many details of the plan are missing to gain compliance with RMC 4-8-120. As such, staff recommends approval of the proposed buffer reduction for the area located adjacent to Road B (south) pursuant to the submittal of a detailed stream buffer mitigation and monitoring plan that complies with the criteria included in RMC 4-8-120 and RMC 3-4-050.

Debris Flow Berm in Stream Buffer

In addition to the stream buffer reduction the applicant has proposed to place the debris flow mitigation berm within the northern boundary of the stream buffer. The provided critical areas report indicates that the existing conditions of the stream buffer is highly degraded and lacks typical buffer functions for a number of reasons, as discussed above. The report concludes that the rocky portion of the buffer would not create any new impacts or degrade the buffer from its existing condition. The reduction in buffer and the placement of the berm are necessary for the proposed plat layout to function with a looped road.

Water Line in Stream Buffer

Beyond the proposed buffer reduction and berm placement within the buffer the applicant is requesting a variance to construct a water line through the stream buffer. This would be a temporary buffer impact of approximately 1,000 square feet of stream buffer during the construction of the water line. Based on the existing utilities in the area, the applicant contends there is no other location where this water connection can be made. The applicant has proposed to complete the construction work in the dry season and re-plant the area with native vegetation. This subject work would require a Hydraulic Permit Approval (HPA), and the applicant intends to follow all the requirements anticipated as a part of the HPA. The provided

Critical Areas Report concluded that the extension of the water line and the restoration of the buffer would not negatively impact the waterbody in any way.

Pedestrian Trail

Included as a part of the proposal, the applicant has provided a pedestrian trail system throughout the development. This trail system creates a loop around the site, utilizing the top of the debris flow mitigation berm located in the stream buffer and a portion of the trail is located in the buffer of both Wetland A and B. Pursuant to RMC 4-3-050C.7.a trails are permitted in stream and wetland buffers provided the trail is located in the outer 25% of the buffer, enhancement of the buffer area is provided, the trail width is equal to or less than 12 feet in width, and the trail is constructed of permeable materials. The provided mitigation plan identifies buffer enhancement plantings for Wetland A and B in addition to enhancement for the stream buffer. However, the material to be used for trail construction was not provided with the application. As such, staff recommends approval of the trail within both the stream buffer and the wetland based on the criteria in RMC 4-3-050C.7.a subject approval of the trail surface materials.

Muckleshoot Indian Tribe Comments

On July 23, 2011 staff received comments from the Muckleshoot Indian Tribe Fisheries Division. Many comments requested clarification about project details, however additional concerns were noted. The Muckleshoot's noted the debris flow mitigation berm location within the stream buffer and the potential for this berm to reduce the lateral movements of the stream. Furthermore, a portion of the stream is located within existing half culverts, and the Muckleshoot's recommend the removal of the culvers as a part of the project to restore the stream to a more natural condition. In addition to the half culverts, under current conditions there is a gravel storage/parking lot located in the "dog leg" section of the site. The Muckleshoot's comments recommend this parking area be decommissioned and replanted, as this facility would no longer be needed as a part of the proposed project. Based on the impacts anticipated to the stream through the buffer reduction and the including of a berm in the stream buffer staff concurs with the Muckleshoot's recommendations to decommission the vehicle parking area. As such, staff recommends as a mitigation measure that the vehicle storage area/parking area located on the southern portion of the site be decommissioned and e-vegetated to prevent additional erosion impacts.

Due to the potential stream impacts on site, Staff recommends as a mitigation measure that the applicant be required to comply with the recommendations found in the *Revised Critical Areas Report & Supplemental Stream Study*, prepared by Sewall Wetland Consulting, Inc., dated August 12, 2011.

Mitigation Measures:

1. The vehicle storage area/parking area located on the southern portion of the site shall be decommissioned and the area shall be re-vegetated to the minimum amount necessary to prevent erosion; this re-vegetation shall be included in the final mitigation and monitoring plan for stream buffer reduction. The final mitigation and monitoring plan shall be submitted to the Planning Department Project Manager for review and approval prior to final plat recording.

2. The applicant shall comply with the recommendations found in the *Revised Critical Areas Report & Supplemental Stream Study*, prepared by Sewall Wetland Consulting, Inc., dated August 12, 2011.

Nexus: SEPA Environmental Regulations, Critical Areas Regulations

b. Storm Water

Impacts: The applicant submitted a Preliminary Drainage Report ("Drainage Report") with the project application, prepared by Pacific Engineering Design, LLC, dated March 15, 2011. The Drainage Report includes preliminary analysis of existing site conditions and addresses the presence of the stream, wetlands, and steep slopes. Pursuant to the provided report, under current conditions, the stream, a drainage ditch that runs along the south side of SR-169, and a 12-inch culvert and catch basin at the SR-169 entrance are the only storm drainage structures onsite. For storm water detention and water quality treatment, the applicant has proposed a detention/wet pond to be located in a separate tract in the northwest corner of the site. The Drainage Report indicates that runoff from roof drains, yards, and driveways would be collected and conveyed to a drainage system under the proposed roads that would convey stormwater to the proposed detention/wet pond. The pond is proposed to be a combined detention and water quality pond, with permanent storage in the bottom of the pond, and live flow control storage above the dead storage. The pond has been designed to provide Level 2 flow control and Basic water quality treatment. The proposed design of the detention pond would provide at least 59,500 cubic feet of storage. The detention facility would release the storm water to its natural discharge location at the northwest corner of the site to the south roadside ditch of Maple Valley Highway (SR-169).

The developed site would have approximately 2.82 acres of impervious surface and 1.66 acres of landscaped and planed area (excluding stream buffers and other critical areas). The Drainage Report identifies that the conveyance system proposed for the development would be designed to convey the 25-year peak flows and checked for flooding conditions at the 100-year event per King County drainage standards.

The applicant proposed to provide erosion and sedimentation control by utilizing Best Management Practices (BMPs) from the King County Stormwater Management Manual. BMPs proposed to be utilized included sediment pond(s) and/or trap(s), silt fencing, construction safety fencing, interceptor v-ditches, rock check dams, plastic sheeting of stockpiles, straw mulch, hydro-seeding, catch basin protection, and rocked construction entrances, etc. Furthermore, the applicant has proposed to utilize the detention/wet pond as a temporary erosion and sediment control pond during construction. BMPs should be helpful in mitigating the potential impacts of erosion and sedimentation however; the proposed detention pond and berm are both located within the stream buffer and/or close proximity to the stream buffer. Due to the potential for impacts to the stream and wetlands as a result of construction activities, staff recommends a mitigation measure that construction fencing and silt fencing be placed along the buffer (or reduced buffer) of the stream and wetlands during construction.

The Drainage Report addressed both upstream and downstream runoff analysis. Pursuant to the provided report the drainage pattern for the upstream portion would remain the same under the proposed developed condition. Offsite runoff would be conveyed around the site to the roadside ditch along the south side of Maple Valley Highway (SR-169). The outfall of the proposed

detention pond would discharge into the SR-169 south side ditch near the northwest corner of the site. Then near the west property line of the site, where the stream joins SR-169, the discharged stormwater runoff is proposed to enter an existing 36-inch CMP culvert that crosses under the highway and discharges to the wetland area inside the Cedar River Flood plain, located in Cavanaugh Pond Natural Area. Pursuant to the downstream analysis, the 36-inch culvert has a slightly reversed slope and is nearly buried by sediment. However, the Drainage Report concludes that if the 36-inch culvert is under capacity, the SR-169 south ditch would continue to drain to the west and either crosses under SR-169 northerly at the next downstream culverts or continue in the ditch and directly discharged into the Cedar River near the bridge. The Drainage Report concludes the proposed development would not create negative effect to the downstream drainage system and proposes to remove the sediment around the inlet of the 36-inch CMP culvert and provided rip rap around the inlet, to improve the sediment problem. However, once the 36-inch culvert is improved the runoff directly discharges into Cavanaugh Pond, a King County Park, and not directly into the Cedar River, furthermore if runoff bypasses this culvert the drainage report has indicated that stormwater would cross Maple Valley Highway further to the west. To the west is the City of Renton Park, Ron Regis, if stormwater is discharged directly into Ron Regis Park, it could have impacts on the City's Park. Because of this unique situation, there may be additional impact to the City's park as a result of stormwater discharge at this location. As such, staff recommends as a mitigation measure, that additional downstream analysis is conducted to analyze the impacts of stormwater runoff on Ron Regis Park and any impacts to the Park shall be mitigated. This analysis can be included in the Drainage Report submitted with the construction permit application.

Mitigation Measures:

1. Construction fencing and silt fencing shall be placed along the buffer (or reduced buffer) of the stream and wetlands during construction. During construction of the debris flow mitigation berm, the fencing may be moved south to provide space to construct the berm within the buffer area.
2. Additional downstream analysis shall be conducted to analyze the impacts of stormwater runoff on Ron Regis Park and any impacts to the Park shall be mitigated. This analysis can be included in the Drainage Report submitted with the construction permit application.

Nexus: SEPA Regulations

3. Parks and Recreation

Impacts: The proposed development would reduce the number of housing units at the subject site. As such the impacts on parks may also be reduced as a result of this change. Based on the exiting number of units the proposed project would not be subject to mitigation fees for Parks. However, the City is currently amending the SEPA based mitigation fee to a GMA based impact fee. The applicant shall be required to pay any fees in place at the time of Final Plat, Construction Permit, or Building Permit, based on the codes in place at the time.

Mitigation Measures: No mitigation required.

Nexus: N/A

4. Historic and Cultural Preservation

Impacts: Pursuant to the Preliminary Geotechnical Engineering Report prepared by Geotech Consultants, Inc., dated April 1, 2008. The Cedar River historically flowed up against the southern slopes of the site. Since approximately 13,000 years ago, the Cedar River has meandered downstream

in the Renton-Maple Valley area across the width of the river valley. Furthermore, developments within the vicinity of the Cedar River are more likely to be sites where significant historic and/or cultural resources would be found, and the subject development has indicated that site grading would be conducted. Therefore, staff recommends a mitigation measure that requires the applicant and/or developer to stop work and immediately notify the City of Renton Planning Division, concerned Tribes' cultural committees, and the Washington State Department of Archeological and Historic Preservation if any Native American grave(s) or archaeological/cultural resources (Indian artifacts) are found.

Mitigation Measures: If any Native American grave(s) or archaeological/cultural resources (Indian artifacts) are found, all construction activity shall stop and the owner/developer shall immediately notify the City of Renton Planning Division, concerned Tribes' cultural committees, and the Washington State Department of Archeological and Historic Preservation.

Nexus: SEPA Environmental Regulations

5. Transportation

Impacts: The applicant submitted with the project application packet a Traffic Impact Analysis prepared by TraffEx, dated October 14, 2010. This analysis concludes that the McCormick Plat would result in an estimated net increase of 6 PM peak hour trips, 5 AM peak hour trips and an overall increase in 89 trips.

The site is bordered by SR-169 on the north; this road has a posted speed limit of 50 mph. The school bus stop for Tiffany Park Elementary, Nelsen Middle School and/or Lindbergh High School is located in a bus pullout area on the south side of SR-169 adjacent to the east side of the existing Valley View Mobile Home Park driveway. Furthermore, four accidents were recorded within approximately 1,000 feet of the Valley View Mobile Home Park driveway for the 3-year period ending in April 30, 2010. All four accidents were single vehicle accidents, and the TraffEx report concludes that there are no safety issues with the proposed site access to SR 169.

The Washington State Department of Transportation's (WSDOT) current Design Manual was used to determine if the subject projected traffic volumes at the intersection of the site's access point warrant a right turn lane or pocket on SR-169. The WSDOT Design Manual recommends a right turn pocket or taper on SR 169 at the site access. Due to the potential traffic impacts of the subject project, staff recommends as a mitigation measures that the applicant be required to comply with the recommendations found in the Traffic Impact Analysis prepared by TraffEx, dated October 14, 2010, that was submitted with the project application and provided a right turn pocket along SR-169 for safe access to the subject site.

Furthermore traffic impacts to City streets are expected due to the additional trips created as a result of the proposed development. As such, staff recommends as a mitigation measure that the applicant pay a Traffic Impact/Mitigation Fee in place at the time of Final Plat recording. Current fee structure includes a \$75.00 per new trip, based on the proposal this fee would equate to \$6,675.00 (89 trips x \$75.00 = \$6,675.00).

Mitigation Measures:

1. The applicant shall comply with the recommendations found in the Traffic Impact Analysis prepared by TraffEx, dated October 14, 2010, that was submitted with the project application and provided a right turn pocket along SR-169 for safe access to the subject site.

2. The applicant shall pay the Traffic Impact/Mitigation Fee as required at the time of Final Plat recording, Construction Permit, or Building Permit based on the codes in place at that time.

Nexus: SEPA, Transportation Mitigation Fee Ordinance No. 3100., GMA

6. Fire & Police

Impacts: The proposed development would reduce the number of housing units at the subject site. As such the impacts on Fire and Police may also be reduced as a result of this change. Based on the existing number of units the proposed project would not be subject to mitigation fees for Fire. However, the City is currently amending the SEPA based mitigation fees to a GMA based impact fee. The applicant shall be required to pay any fees in place at the time of Final Plat, Construction Permit, or Building Permit, based on the codes in place at the time.

Mitigation Measures: No mitigation required.

Nexus: N/A

7. Housing

Impacts: The existing development (Valley View Mobile Home Park) consists of approximately 40 mobile homes and 1 existing duplex, which equals 42 dwelling units that provide housing to the low-income residence of the City of Renton. The applicant has proposed to remove all 42 dwelling units to develop the McCormick Plat. The new residential development proposal would provide 34 single-family residential units, which are anticipated to provide housing for the middle-income housing bracket. This proposed development would result in a potential loss of affordable housing in the Renton community by eliminating approximately 42 existing manufactured homes spaces and replacing them with 34 new single-family residential lots; an actual net loss of 10 dwelling units. City policies in the Housing Element of the Comprehensive Plan ensure that housing exists for all economic segments of Renton's populations. The project impacts existing affordable housing in Renton, including a loss of affordable manufactured and mobile home units and direct impacts to the residents currently living at Valley View Mobile Home Park as such, mitigation should be provided.

Currently the State of Washington provides financial assistance to manufactured home owners who must relocate due to redevelopment/park closure. However, this program requires each homeowner to qualify for reimbursement and the residents are required to fund their own relocation and then apply to the State for reimbursement. Finding the available funds to relocate and waiting for approval and reimbursement from the State is a hardship in itself for the low-income residence located at the Valley View Mobile Home Park. Pursuant to a Memorandum issued by the State Relocation Assistance Program, from February of 2010, a large number of park closures are causing delay in reimbursement for relocation expenses to eligible applicants. The State proclaims, in this Memo, that they are unable to estimate how long the reimbursement process will take due to the fluctuation of the revenue source. However, the state will reimburse qualified homeowners up to \$7,500 for a single-section home and \$12,000 for a multi-section home, there is no State reimbursement for owners of recreational vehicles, park models, and travel trailers.

During the comment period for the subject project, many phone calls and personal visits from residents or mobile home owners living at the site were fielded by staff. However, these comments are unofficial, as they are not in writing, but the conversations lead staff to believe that re-location assistance is necessary for the residents located in Valley View. On August 2, 2011 a letter was received from Courtney Kaylor with McCullough Hill Leary, PS the legal representation for Mr.

McCormick. This letter represented the above situation with State reimbursement and the need to provided re-location assistance to the residence at Valley View Mobile Home Park. Included in this letter was Mr. McCormick agreement to a mitigation measure to mitigate for the loss of affordable housing. Mr. McCormick ("owner") voluntary agreed to pay the relocation cost of the homeowners within the Valley View Mobile Home Park subject to the following conditions:

1. The relocation assistance program currently administered by the Department of Commerce pursuant to RCW 59.21 and WAC 365-212 ("State Relocation Assistance Program") must exist at the time notice of closure of the Park is provided by the Owner;
2. The Homeowners to whom assistance is provided must qualify for relocation assistance under the State Relocation Assistance Program and the Department of Commerce must verify the Homeowners qualification;
3. The Owner will pay only those relocation cost for which the State Relocation Assistance Program provides reimbursement; and
4. The Homeowner must agree in writing using a form acceptable to the Owner that the right to reimbursement provided by the State Relocation Assistance program is assigned to the Owner.

The above mitigation measure would provide the residents of Valley View upfront funds to relocate, prior to State reimbursement. In turn, the property owner would receive the reimbursement from the State. The above mitigation measure would assist any residents that qualify for State relocation assistance; however for those who do not qualify would not receive assistance from the landowner. As such staff recommends a mitigation measure for the loss of affordable housing that is similar to the proposed mitigation by the applicant; however, the assistance shall be provided to all residence residing in Valley View at the time of park closure notice.

All the residents of Valley View Mobile Home Park are not property owners, as such, they are not automatically notified regarding land use applications for the subject project or permitted activities on the subject site, although, the residents would be directly affected by any changes to the site. As such, staff recommends as a mitigation measure that information be posted on site visible to the residents notifying them of any land use actions and or permits submitted that would affect the subject property.

Mitigation Measures:

1. The owner of the Valley View Mobile Home Park ("owner") voluntary agreed and shall pay the relocation cost of the homeowners within the Valley View Mobile Home Park subject to the following conditions:
 - a. The relocation assistance program currently administered by the Department of Commerce pursuant to RCW 59.21 and WAC 365-212 ("State Relocation Assistance Program") must exist at the time notice of closure of the Park is provided by the Owner;
 - b. Assistance shall be provided to all homeowners that reside within Valley View Mobile Home Park at the time of park closure notice and meet the State Relocation Assistance Program income requirements for eligibility, however those homeowners who qualify for relocation assistance under the State Relocation Assistance Program and the Department of Commerce must verify the homeowners qualification;
 - c. The Owner will pay up to \$7,500 for a single-section home and \$12,000 for a multi-section home, the funds would be paid only those relocation cost for which the State Relocation Assistance Program provides reimbursement, including but not limited to removal and

reattachment of attached awnings, decks, and stairs; prep for transport; moving the home; permits; hook-ups to all utilities; rental of moving equipment; repair of damage caused during transport; or demolition and a down payment for another manufactured home; and

- d. The Homeowner must agree in writing using a form acceptable to the Owner that the right to reimbursement provided by the State Relocation Assistance program is assigned to the Owner.
2. Information shall be posted on site visible to the residents notifying them of any land use actions and or permits submitted that would affect the subject property. The notice shall be posted prior to submittal to the City or the same day as the submittal.

Nexus: SEPA Environmental Regulations; City of Renton Comprehensive Plan

E. Comments of Reviewing Departments

The proposal has been circulated to City Department and Division Reviewers. Where applicable, their comments have been incorporated into the text of this report and/or "Advisory Notes to Applicant."

- ✓ **Copies of all Review Comments are contained in the Official File and may be attached to this report.**

Environmental Determination Appeal Process: Appeals of the environmental determination must be filed in writing on or before 5:00 PM, September 9, 2011.

Renton Municipal Code Section 4-8-110.B governs appeals to the Hearing Examiner. Appeals must be filed in writing at the City Clerk's office along with the required fee. Additional information regarding the appeal process may be obtained from the City Clerk's Office, Renton City Hall - 7th Floor, 1055 S. Grady Way, Renton WA 98057.

ADVISORY NOTES TO APPLICANT

The following notes are supplemental information provided in conjunction with the administrative land use action. Because these notes are provided as information only, they are not subject to the appeal process for the land use actions.

Planning:

1. RMC section 4-4-030.C.2 limits haul hours between 8:30 am to 3:30 pm, Monday through Friday unless otherwise approved by the Development Services Division.
2. Commercial, multi-family, new single family and other nonresidential construction activities shall be restricted to the hours between seven o'clock (7:00) a.m. and eight o'clock (8:00) p.m., Monday through Friday. Work on Saturdays shall be restricted to the hours between nine o'clock (9:00) a.m. and eight o'clock (8:00) p.m. No work shall be permitted on Sundays.
3. Within thirty (30) days of completion of grading work, the applicant shall hydroseed or plant an appropriate ground cover over any portion of the site that is graded or cleared of vegetation and where no further construction work will occur within ninety (90) days. Alternative measures such as mulch, sodding, or plastic covering as specified in the current King County Surface Water Management Design Manual as adopted by the City of Renton may be proposed between the dates of November 1st and March 31st of each year. The Development Services Division's approval

of this work is required prior to final inspection and approval of the permit.

4. The applicant will be required to submit a Final Stream Mitigation Report and Maintenance and Monitoring proposal. In addition, the applicant will be required to comply with all the code requirements of RMC 4-3-050 Critical Areas. This includes, but is not limited to, placing the critical area within a Native Growth Protection Easement, providing fencing and signage, and providing the City with a site restoration surety device and, later, a maintenance and monitoring surety device.
5. The applicant may not fill, excavate, stack or store any equipment, dispose of any materials, supplies or fluids, operate any equipment, install impervious surfaces, or compact the earth in any way within the area defined by the drip line of any tree to be retained.
6. The applicant shall erect and maintain six foot (6') high chain link temporary construction fencing around the drip lines of all retained trees, or along the perimeter of a stand of retained trees. Placards shall be placed on fencing every fifty feet (50') indicating the words, "NO TRESPASSING – Protected Trees" or on each side of the fencing if less than fifty feet (50'). Site access to individually protected trees or groups of trees shall be fenced and signed. Individual trees shall be fenced on four (4) sides. In addition, the applicant shall provide supervision whenever equipment or trucks are moving near trees.

Plan Review – Water:

1. A water availability certificate is required from Cedar River Water District.
2. Per the City Fire Marshal, the preliminary fire flow requirement for a single family home is 1,000 gpm minimum for dwellings up to 3,600 square feet (including garage and basements). If the dwelling exceeds 3,600 square feet, a minimum of 1,500 gpm fire flow would be required. A minimum of one fire hydrant is required within 300 feet of the proposed buildings, and two hydrants if the fire flow goes up to 1,500 gpm. Lateral spacing of fire hydrants is predicated on hydrants being located at street intersections (also capable of delivering a minimum of 1,000 gpm) within 300 feet of the structure. This distance is measured along the travel route.
3. All lots on dead end access roadways that exceed 500 feet require fire sprinklers. This applies to lots 14 through 17, and lots 20 through 26, as proposed.
4. The proposed project needs to show how they intend to serve the new development with water service to all of the lots and fire protection.

Plan Review – Sanitary Sewer:

1. A sanitary sewer availability certificate is required from the Cedar River Sewer District.
2. The proposed project needs to show how they intend to serve the new development with sanitary sewer service to all of the lots.

Plan Review – Street Improvements:

1. Street improvements including curb, gutter, 5' sidewalks, street lighting, and paving with an 8' planter strip all to City standards will be required to be installed across the full frontage of the parcel being developed.
2. The internal streets shall install a minimum of 20' pavement with parking on one side; hence, a 26' pavement section. The road section shall include 5' sidewalks on both sides (in those areas where there are lots on both sides).
3. Fire department apparatus access roadways are required to be minimum 20 feet wide, fully paved, with a turning radius of 25 feet inside and 45 feet outside.
4. Residential alleys are 16 feet in width.
5. Street lighting will be required per City of Renton standards along the frontage and on the internal

streets. Private street lighting, including PSE, is not allowed.

6. All new electrical, phone, and cable services and lines must be undergrounded. The construction of these franchise utilities must be inspected and approved by a City of Renton public works inspector prior to recording the plat.

Plan Review – Storm Drainage:

1. The City does not have any records of existing storm drainage facilities in Maple Valley Hwy fronting this parcel.
2. A conceptual drainage plan and report is required to be submitted with the formal application for the plat. A drainage control plan designed per the City of Renton Amendments to the King County Surface Water Manual 2009 is required.
3. The conceptual storm drainage plan needs to address how the roof runoff from the new lots will be handled.
4. SDC fees are \$1,012 per lot. These fees are collected at the time a construction permit is issued.

Plan Review – General:

1. All required utility, drainage, and street improvements will require separate plan submittals, prepared according to City of Renton drafting standards, by a licensed Civil Engineer.
2. All plans shall be tied to a minimum of two of the City of Renton Horizontal and Vertical Control Network.
3. Permit application must include an itemized cost estimate for these improvements. Half of the fee must be paid upon application for building and construction permits, and the remainder when the permits are issued. There may be additional fees for water service related expenses. See Drafting Standards.

Fire and Emergency Services:

1. Fire mitigation and/or impact fees shall be paid at the time of final plat recording.
2. The fire flow requirement for a single family home is 1,000 gpm minimum for dwellings up to 3,600 square feet (including garage and basements). If the dwelling exceeds 3,600 square feet, a minimum of 1,500 gpm fire flow would be required. A minimum of one fire hydrant is required within 300-feet of the proposed building and two hydrants if the fire flow goes up to 1,500 gpm. A water availability certificate is required from Cedar River Water and Sewer District.
3. Fire department apparatus access roadways are required to be minimum 20-foot wide fully paved, with 25-foot inside and 45-foot outside turning radius. Fire access roadways shall be constructed to support a 30-ton vehicle with 322-psi point loading exceeding 150-feet require an approved turnaround. Full 90-foot diameter cul-de-sac required is required when dead end streets exceed 300-feet long. City street standards required 20-foot wide streets with a 6-foot wide parking area on one side of the street only. Parking is not allowed on the other side of the street and shall be posted as such.
4. Homes on all proposed lots are required to be fire sprinkled.

Park Department:

Parks mitigation and/or impact fees shall be paid at the time of final plat recording.

Property Services:

Property Services Comments are attached to this report as Exhibit 15.

King County:

King county Code 21A.24 shall be followed for the portion of the site located within King County.



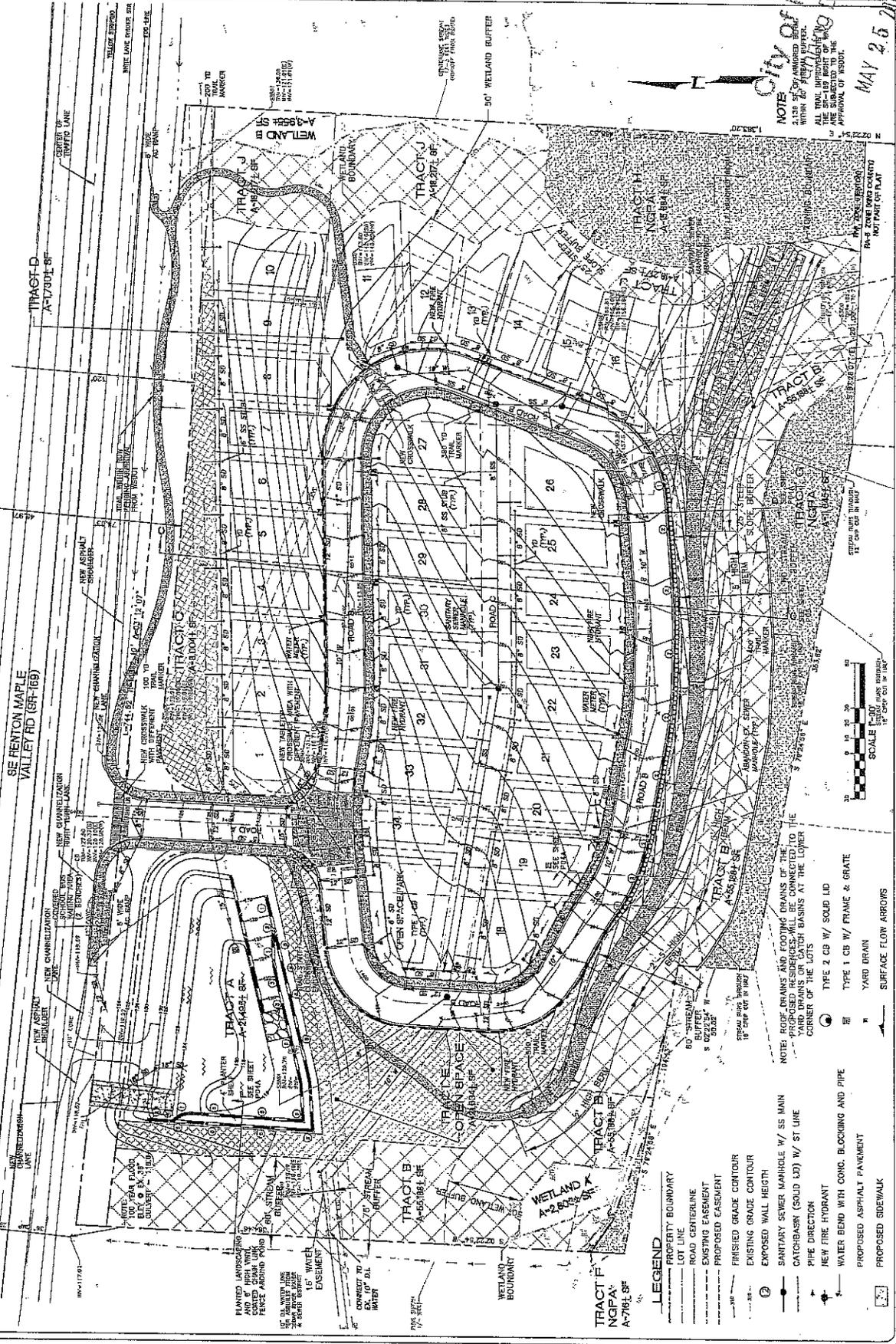
Pacific Engineering & Design, LLC
 Civil Engineering & Planning Consultants
 Phone: (206) 431-7370 Fax: (206) 338-1849
 15445 35th Ave. Seattle, WA 98188 www.pacificeng.com

McCormick Plat
 CITY OF RENTON

PROJECT NO. 07000
 DRAWN BY: CMB
 ISSUE DATE: 9-9-2011
 SHEET NO. 12

CONCEPTUAL SITE PLAN
PO4
 SHEET 04 OF 12

A PORTION OF THE SE 1/4, SEC. 23, TWP. 23 N., RGE. 5 E., W.M. AND A PORTION OF THE SE 1/4, SEC. 24, TWP. 23 N., RGE. 5 E., W.M.



NOTE:
 1. ALL TRAIL IMPROVEMENTS SHALL BE IN ACCORDANCE WITH THE 2008 RENTON CITY CODE.
 2. ALL TRAIL IMPROVEMENTS SHALL BE IN ACCORDANCE WITH THE 2008 RENTON CITY CODE.
 3. ALL TRAIL IMPROVEMENTS SHALL BE IN ACCORDANCE WITH THE 2008 RENTON CITY CODE.

MAY 25 2011

RECEIVED

EXHIBIT 4

- LEGEND**
- PROPERTY BOUNDARY
 - LOT LINE
 - ROAD CENTERLINE
 - - - EXISTING EASEMENT
 - - - PROPOSED EASEMENT
 - FINISHED GRADE CONTOUR
 - EXISTING WALL HEIGHT
 - SANITARY SEWER MAINLINE W/ SS MAIN
 - CATCHBASIN (SOLID LID) W/ ST LINE
 - PIPE DIRECTION
 - NEW FIRE HYDRANT
 - WATER BEND WITH CONC. BLOCKING AND PIPE
 - PROPOSED ASPHALT PAVEMENT
 - PROPOSED SIDEWALK
 - TYPE 2 CB W/ SOLID LD
 - TYPE 1 CB W/ FRAME & GRATE
 - ▣ YARD DRAIN
 - SURFACE FLOW ARROWS

NOTE:
 1. ROOF DRAINS AND FOOTING DRAINS OF THE PROPOSED RESIDENCES WILL BE CONNECTED TO THE YARD DRAINS OR CATCH BASINS AT THE LOWER CORNER OF THE LOTS.



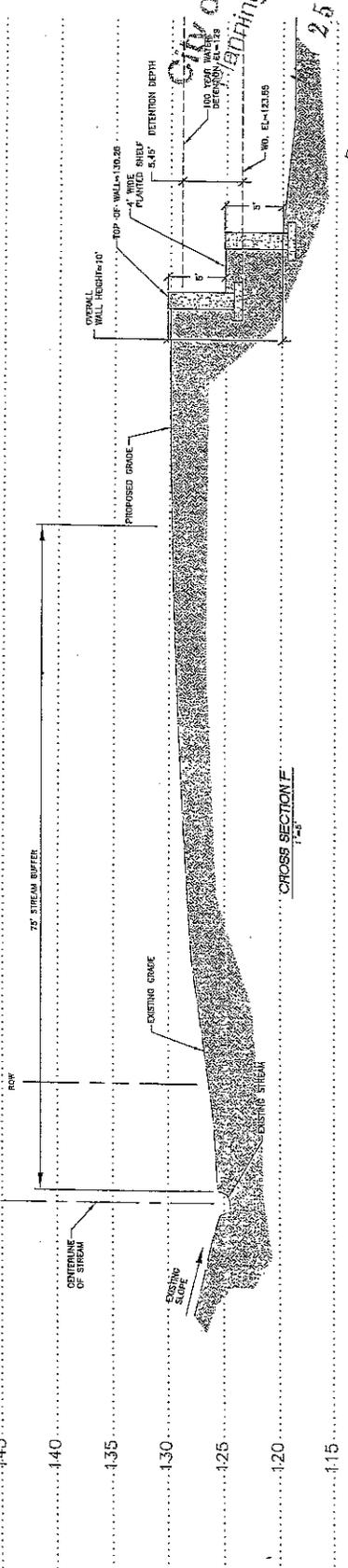
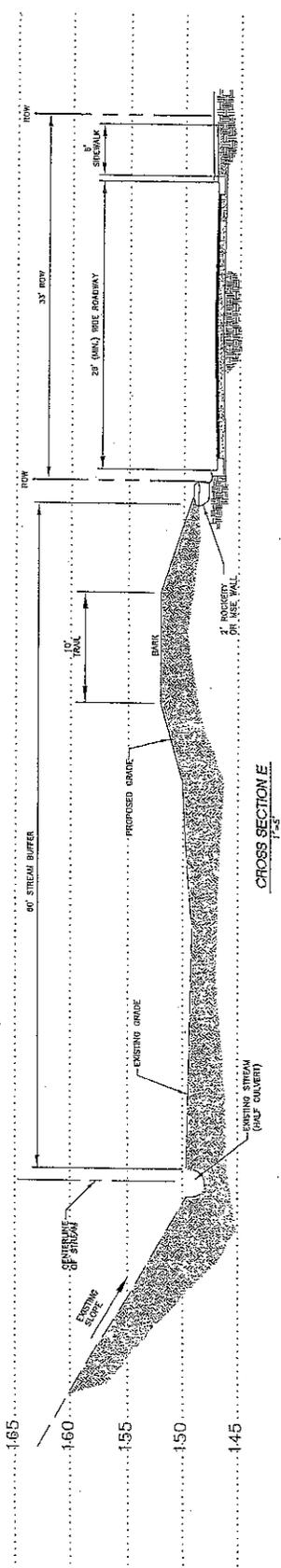
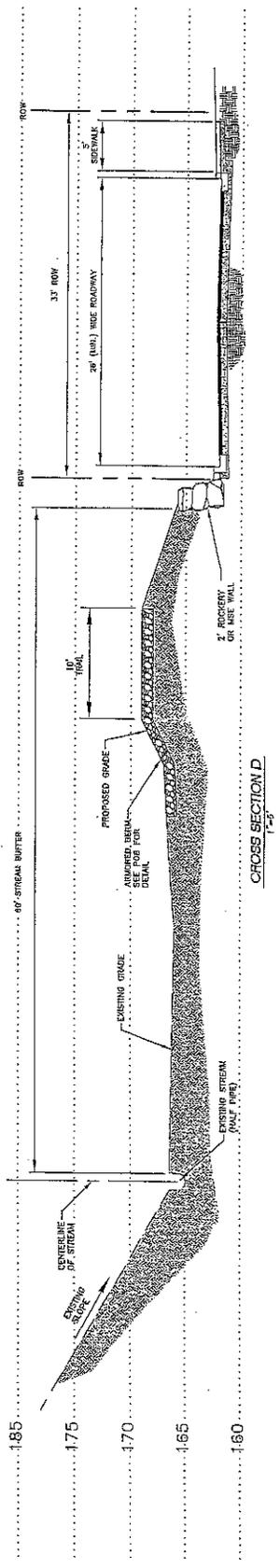
REVISIONS:

A PORTION OF THE SE 1/4, SEC. 23, TWP. 23 N, RGE. 5 E., W.M. AND A PORTION OF THE SE 1/4, SEC. 24, TWP. 23 N, RGE. 5 E., W.M.

Pacific Engineering
Design, LLC
Civil Engineering Consultants
Phone (206) 401-7970 Fax (206)268-1648
15445 SRFD Ave. Seattle, WA 98188 www.paceng.com

McCORMICK PLAT
CITY OF RENTON
PROJECT NO: 07068
DRAWN BY: CUB
ISSUE DATE: 9-9-2011
SHEET REV: 1

PROJECT NO: 07068
DRAWN BY: CUB
ISSUE DATE: 9-9-2011
SHEET REV: 1
SITE STREAM BUFFER SECTIONS
City of Renton Planning Division
P04A
SHEET 05 OF 12

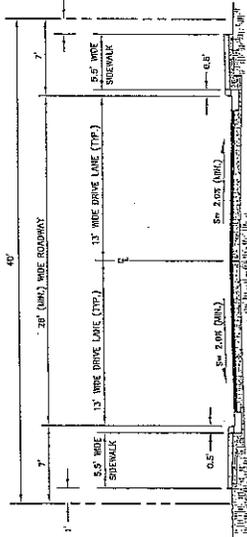


RECEIVED

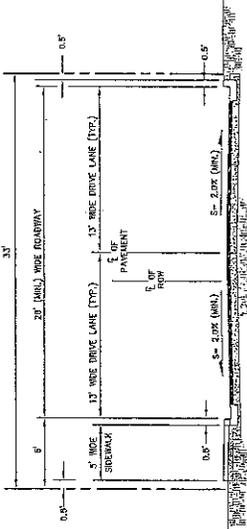
EXHIBIT 5

REVISIONS:

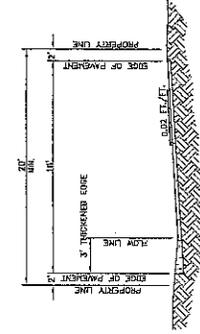
A PORTION OF THE SE 1/4, SEC. 23, TWP. 23 N., RGE. 5 E., W.M. AND A PORTION OF THE SE 1/4, SEC. 24, TWP. 23 N., RGE. 5 E., W.M.



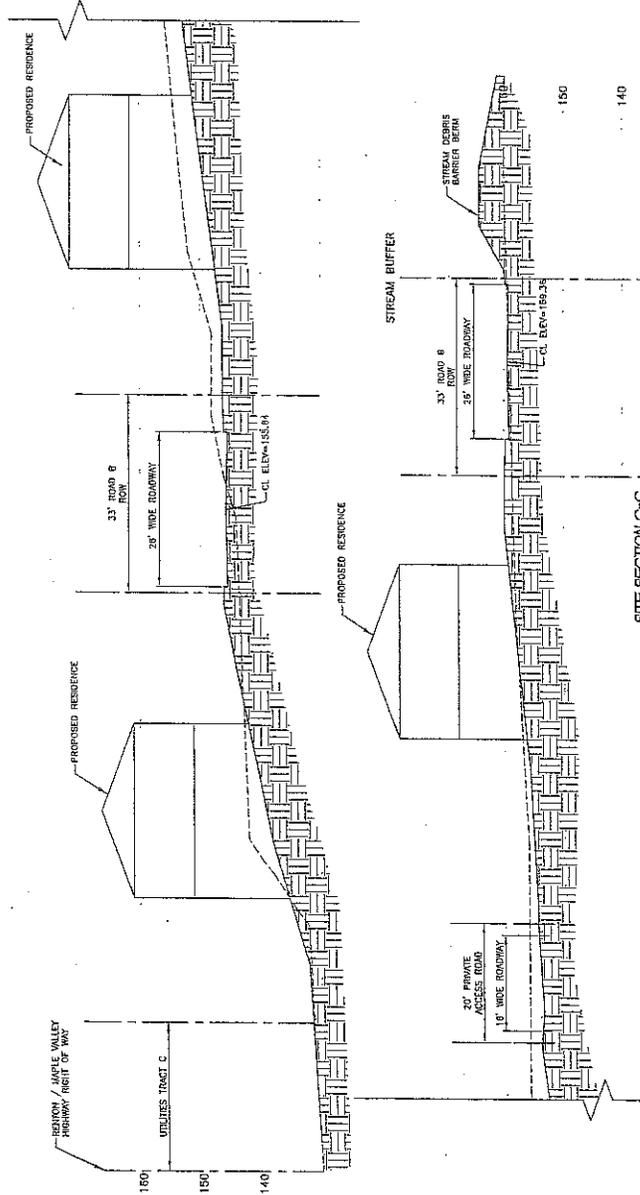
ROAD A CROSS SECTION
1/8" = 1'-0"



ROAD B CROSS SECTION
1/8" = 1'-0"



ROAD C CROSS SECTION
1/8" = 1'-0"



SITE SECTION C-C
SCALE: 1" = 10'



Pacific Engineering & Design, LLC
 Civil Engineering & Planning Consultants
 Phone: (206) 431-7970 Fax: (206) 438-1648
 15445 53rd Ave Seattle, WA 98188 www.pacific.com

MCCORMICK PLAT
 CITY OF RENTON

FOR: MCCORMICK PLAT
 15445 53RD AVE SE
 SEATTLE, WA 98148
 PHONE: (206) 845-2000
 PROJECT NO.: 07090

CONCEPTUAL SITE SECTION

P05
 SHEET 06 OF 12

City of Renton
 Planning Division
 MAY 25 2011

RECEIVED

EXHIBIT 6



Pacific Engineering
Design, LLC
 Civil Engineering &
 Planning Consultants
 Phone: (206) 431-7970 Fax: (206) 288-1648
 15445 65th Ave. Seattle, WA 98188 www.pacificeng.com

McCormick Plat
 CITY OF RENTON

PROJECT NO: 07095
 DRAWN BY: OJB
 ISSUE DATE: 02-19-2010
 SHEET REV:

SLOPE ANALYSIS

P10
 SHEET 11 OF 12

A PORTION OF THE SE 1/4, SEC. 23, TWP. 23 N., RGE. 5 E., W.M. AND A PORTION OF THE SE 1/4, SEC. 24, TWP. 23 N., RGE. 5 E., W.M.



Slopes Table

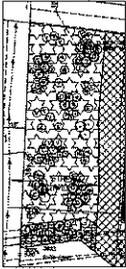
Number	Minimum Slope	Maximum Slope	Color
1	0.00%	16.00%	Light Green
2	15.00%	40.00%	Yellow
3	40.00%	100.00%	Red



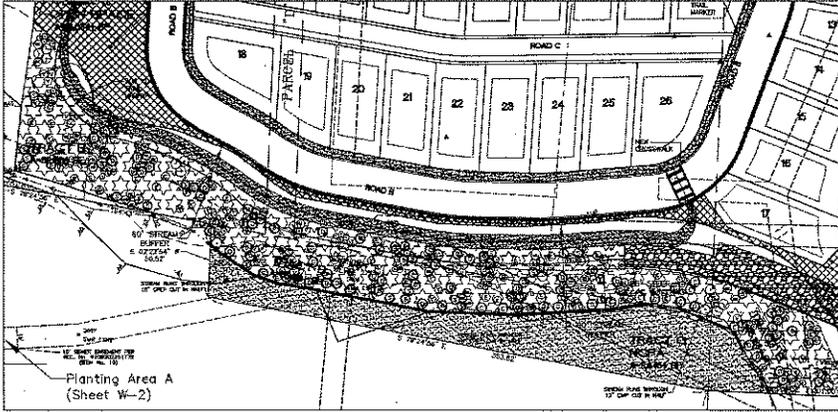
RECEIVED

EXHIBIT 8

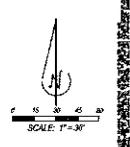
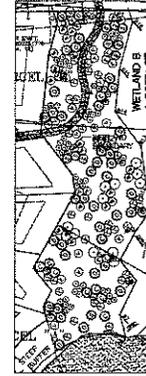
Planting Area C



Planting Area A

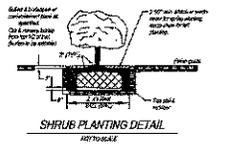
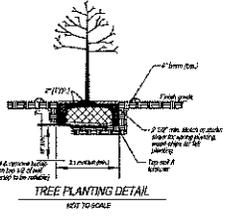
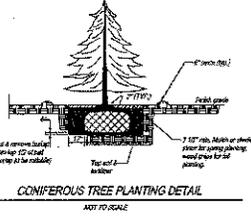


Planting Area B



REVISIONS

Δ	REVISIONS



PLANTING LIST

QTY	PLANT NAME	SIZE	SPACING
TREES			
43	Bip Leaf Maple	2 gal.	as shown
53	Acer macrophyllum	2 gal.	as shown
53	Silva Spruce	2 gal.	as shown
65	Picea canadensis	2 gal.	as shown
65	Douglas Fir	2 gal.	as shown
65	Pseudotsuga mertensiana	2 gal.	as shown
65	Western Red Cedar	2 gal.	as shown
65	Thuja plicata	2 gal.	as shown
SHRUBS			
70	Vine Maple	2 gal.	as shown
64	Acer canadense	2 gal.	as shown
64	Halethrus	2 gal.	as shown
64	Coccoloba canadensis	2 gal.	as shown
64	Red Elderberry	2 gal.	as shown
64	Sambucus racemosa	2 gal.	as shown
64	Indian Plum	2 gal.	as shown
64	Ostrya virginiana	2 gal.	as shown
64	Shrubbery	2 gal.	as shown
64	Symonanthus albus	2 gal.	as shown
64	Red-Flowering Currant	2 gal.	as shown
64	Ribes sanguineum	2 gal.	as shown

NOTE: BASE MAP PROVIDED BY PACIFIC ENGINEERING DESIGN, LLC



McCORMICK PLANT MITIGATION PLAN PLANTING SHEET

Job No.	AL-08
Drawn by	JP
Checked by	JP
Date	Dec 8, 2009
SHEET	102
OF	102

M E M O R A N D U M

DATE: June 21, 2011
TO: Vanessa Dolbee
FROM: Bob Mac Onie 
SUBJECT: McCormick Plat, LUA-11-034-PP, PUD
Format and Legal Description Review

I have reviewed the above referenced preliminary plat submittal and have the following comments:

Comments for Project Manager:

Please note that the City of Renton currently has a lien recorded against this property, under recording number 20110215001066.

This subdivision should include the segregation of the "panhandle" portion of the property into a separate "Tract." I don't know how only part of a property can be platted, underlying Parcel 'A.' If a separate tract isn't to be created by the plat a lot line adjustment needs to be approved and recorded prior to the recording of the plat.

Comments for the Applicant:

Correct the indexing information with respect to Section 24 as the site is a portion of the SW quarter.

The work 'TRACT' appears in several of the underlying 'Parcel' legal descriptions on the Plat and on the title report when it is apparent that the word should be 'TRACK' vis-à-vis reference to the 'centerline of tract [sic] and right of way.' The title company should also correct their records as well.

Remove the Project Data block, including the blocks for the owner, Engineer and Surveyor on page 1 of 2 as these are only preliminary plat approval requirements.

Information needed for final plat approval includes the following:

Addressee Name
Page 2 of 3
Date of Memo

Note the City of Renton land use action number and land record number, LUA-11-034-FP and LND-10-0486 respectively, on the final plat submittal (all submittal sheets). The LUA number will change for when final plat submittal is made.

Provide sufficient information to determine how the final plat boundary was established and identify a basis of bearing related to the defining elements, the date existing monuments were visited, note discrepancies between bearings and distances of record and those measured or calculated, if any, and all the other requirements specified in WAC 332-130-050.

List and if possible delineate all easements and other encumbrances of record.

Show any encroachments by or on the property at issue.

Provide calculations and closures for the Plat and lots and tracts.

Include a statement of equipment and procedures used, per WAC 332-130-100.

Note the addresses for the platted lots. The address will be available after approval of the preliminary plat. Street names are to be assigned and will be provided when available.

Note what is to be set at all property corners and for right of way monuments.

Complete City of Renton Monument Cards, with reference points of all new right of way monuments set as part of the plat.

Provide an OWNER'S DECLARATION; statement of dedication of the plat.

Required City of Renton signatures on the final plat submittal include the Administrator of Public Works, the Mayor and the City Clerk. An approval block for the city's Finance Director is also required. Note that the title for the Administrator has changed. Also provide the pertinent King County recording approval blocks.

All vested owner(s) of the subject plat need to sign the final plat and the signatures must be accompanied by the appropriate notaries.

Note that if there are restrictive covenants, easements or agreements to others (neighboring property owners, etc.) as part of this subdivision, they can be recorded concurrently with the plat. The plat drawing and the associated document(s) are to be given to the Project Manager as a package. The recording number(s) for the associated document(s) will be cross referenced on the plat in the appropriate locations.

With a Homeowner's Association (HOA) planned for this plat, the following language concerning ownership of the various Tracts (the open space and recreation tracts) applies to this plat and should be noted on the final plat submittal as follows:

Upon the recording of this plat, Tract(s) is hereby granted and conveyed to the *Plat Name* Homeowners' Association (HOA) for *Purpose of Tracts*. All

Addressee Name
Page 3 of 3
Date of Memo

necessary maintenance activities for said Tract(s) will be the responsibility of the HOA. In the event that the HOA is dissolved or otherwise fails to meet its property tax obligations, as evidenced by non-payment of property taxes for a period of eighteen (18) months, then each lot in this plat shall assume and have an equal and undivided interest in the Tract previously owned by the HOA and have the attendant financial and maintenance responsibilities.

NOTE: Use the above noted language for the other tracts associated with this plat, with changes made to said language as needed, depending on the type of tract noted.

Clearly state who is to own the various tract's created if not the HOA.

Provide a 'Legend' for the plat drawing identifying the symbols used therein.

Include a north arrow with the vicinity map.

Note whether the adjoining properties are platted (show plat name and lot numbers) or 'Unplatted'.

A Native Growth Protection Easement (NGPE) statement needs to be included for those areas identified as such.

An updated Plat Certificate dated within 45 days of final approval by the Hearing Examiner.

Fee Review Comments:

Please contact Dave Christensen for the fee review.

From: Vanessa Dolbee
Sent: Thursday, August 18, 2011 8:28 AM
To: 'Karen Walter'
Subject: RE: McCormick Preliminary Plat, LUA11-034, ECF, PP, V-A, PPDU; Revised Notice of Application and Proposed Determination of Non-Significance, Mitigated
Attachments: A8-106 Revised Report 8-12-11 (2).pdf; A8-106 Data Forms.pdf; A8-106 8-8-2011 Base CONCEPT.PDF; A8-106 8-8-2011 Base PLANTING.PDF; A8-106 8-8-2011 Base NOTES.PDF

Karen,

Thank you for your comments on the McCormick Plat and PUD, LUA11-034. Please find responses to your comments below:

1. *Please clarify the purpose of the "debris flow berm" proposed for this project. This berm will restrict the lateral movement of the Type N stream and likely interfere with the transport of spawning gravels and wood from the upstream portions of the stream that may otherwise distribute downstream including the Cedar River.*

The purpose of the debris flow berm is to prevent debris overflow to the McCormick Plat future homes. There is an existing water quality/detention pond (known as Summerfield Creek Wet Pond #1) at the headwaters to the stream that runs along the south side of the site. The pond has a primary and secondary overflow system. In the extremely unlikely event that both systems fail, the debris flow berm will halt overflow of water and soil debris from reaching the development.

The stream is located in a half culvert at the toe of the slope located to the south of the site. The stream is topographically higher than land to the north and generally no gravel or sediment enters the stream from the north side of the channel. The berm is located to the north of the stream and is located entirely outside the ordinary high water mark of the stream. Therefore, the berm will actually allow spawning gravels and wood to be maintained within the channel and will not interfere with any transport or recruitment of gravel.

2. *We would also like to see the proposed planting plan for the berm and stream riparian areas described in the revised Critical Areas report to ensure that riparian functions will be maximized.*

The detailed mitigation plan and an updated Critical Area Report dated August 12, 2011 provide this information and show the proposed plantings, habitat materials as well as describe functional lift from the proposed enhancement project. Please find this information attached.

3. *Please clarify the purpose of the existing half culverts in the stream on site. These culverts should be removed as part of this project if they are not needed to provide access to the southern portion of the site to restore the stream to a more natural condition. The gravel road should also be decommissioned and replanted, as well as the vehicle storage area since they are likely not needed for the project and will reduce sediment sources to the stream.*

As described in the Critical Area Report dated August 12, 2011, the project significantly improves the quality of the stream buffer by removing existing mobile homes and concrete pads located in the buffer area. The half-culvert that the stream flows in is an existing condition. The half-culvert is south of and outside any work proposed.

The applicant contends that no work in the channel is required for this project. Removal of the culverts would require substantial stream channel relocation and armoring to prevent erosion, which would in turn require state and federal permits. This work is outside the scope of this project.

As such, in order to resolve this concern City staff feels a meeting between the tribes, City of Renton, the Applicant and Ed Sewall, project Biologist would facilitate in resolving concerns around this stream. The applicant and City staff would like to keep the project on schedule for the Public Hearing, as many members of the public have been notified of the hearing date. If it all possible a meeting for early next week, Monday or Tuesday would be ideal.

The City staff is proposing a mitigation measure that would require the removal of the overflow parking area including the impervious surfaces. This area would be required to be re-landscaped to reduce erosion potential.

4. *The existing potable water well should be required to be decommissioned as part of the project since the project will be receiving municipal water from the Cedar Water and Sewer District.*

The applicant has indicated that they would like to reserve the right to utilize any existing wells and water rights on site for irrigation purposes. Any well not chosen by the applicant for utilization will be decommissioned.

5. *Please clarify how the applicant proposes to route stormwater to the Cedar River. This approach would require piping stormwater offset underneath SR 169 and through downstream properties. Since there is no discussion about easements or other agreements with downstream property owners, it is not clear how the stormwater will be routed directly to the Cedar River. Also, what analysis has been completed to evaluate the potential to infiltrate stormwater or use low impact development techniques to treat and manage stormwater.*

The proposed detention/wet pond will discharge to the public stormwater system. Therefore, no drainage easement is required. The stormwater system for the plat connects to an existing public drainage conveyance adjacent to the western property boundary to an existing 36" CMP culvert crossing underneath SR 169 near the northwest corner of the site. The culvert drains to a stream/open channel that in turn discharges to the Cedar River. A rip-rap erosion control pad at the discharge point is proposed. The detention/wet pond is designed with extensive landscaping to provide wildlife habitat and an amenity to the site.

A Geotechnical Report has been prepared by Geotech Consultant, Inc. According to the Geotechnical Report, the site is covered with approximately 10 to 40 feet of relatively loose mass waste soils lying over mostly medium-dense alluvial sand and gravel. Groundwater was encountered at 2.5' to 11.5' below existing ground at test pits and boring locations. Due to the shallow ground water level and hilly site condition, infiltration is not suitable for this site. Small lot sizes are proposed for this site to minimize the footprint for the site. Other low impact improvement BMPs that utilize infiltration or dispersion are not deemed suitable for this site.

Please let me know as soon as possible if a meeting next week would be workable. Again, thank you for your comments on the subject project.

Vanessa Dolbee
Senior Planner

Department of Community & Economic Development
City of Renton
Renton City Hall - 6th Floor
1055 South Grady Way
Renton, WA 98057
425.430.7314

From: Karen Walter [mailto:KWalter@muckleshoot.nsn.us]
Sent: Thursday, July 14, 2011 12:18 PM
To: Vanessa Dolbee
Subject: McCormick Preliminary Plat, LUA11-034, ECF, PP, V-A, PPDU; Revised Notice of Application and Proposed Determination of Non-Significance, Mitigated

Vanessa,
In today's mail, we received the revised Notice of Application for the McCormick Preliminary Plat. Previously we submitted the comments in the email below to the Notice of Application. Did the City send a response to these comments? I cannot find record of them in our files. If not, please consider these comments applicable to the Revised Notice of Application. We look forward to the City's responses.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division
39015 172nd Ave SE
Auburn, WA 98092
253-876-3116

From: Karen Walter
Sent: Thursday, June 23, 2011 11:45 AM
To: Vanessa Dolbee
Subject: McCormick Preliminary Plat, LUA11-034, ECF, PP, V-A, PPDU; Notice of Application and Proposed Determination of Non-Significance, Mitigated

Vanessa,

The Muckleshoot Indian Tribe Fisheries Division has reviewed the Notice of Application including the proposed mitigation measures, the environmental checklist and the revised Critical Areas Report (April 12 2011). We offer the following comments in the interest of protecting and restoring the Tribe's treaty protected fisheries resources.

6. Please clarify the purpose of the "debris flow berm" proposed for this project. This berm will restrict the lateral movement of the Type N stream and likely interfere with the transport of spawning gravels and wood from the upstream portions of the stream that may otherwise distribute downstream including the Cedar River.
7. We would also like to see the proposed planting plan for the berm and stream riparian areas described in the revised Critical Areas report to ensure that riparian functions will be maximized.
8. Please clarify the purpose of the existing half culverts in the stream on site. These culverts should be removed as part of this project if they are not needed to provide access to the southern portion of the site to restore the stream to a more natural condition. The gravel road should also be decommissioned and replanted, as well as the vehicle storage area since they are likely not needed for the project and will reduce sediment sources to the stream.

9. The existing potable water well should be required to be decommissioned as part of the project since the project will be receiving municipal water from the Cedar Water and Sewer District.
10. Please clarify how the applicant proposes to route stormwater to the Cedar River. This approach would require piping stormwater offset underneath SR 169 and through downstream properties. Since there is no discussion about easements or other agreements with downstream property owners, it is not clear how the stormwater will be routed directly to the Cedar River. Also, what analysis has been completed to evaluate the potential to infiltrate stormwater or use low impact development techniques to treat and manage stormwater.

We appreciate the opportunity to review this proposal and look forward to the City's responses.

Thank you,
Karen Walter
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division
39015 172nd Ave SE
Auburn, WA 98092
253-876-3116